

Morris-Gibson v. UAW, et al.  
Case No. 2:20-cv-11346

Brief in Support of Defendant George Hardy's Motion for Summary Judgment  
Supporting Documents

# **EXHIBIT 1**

**Patricia Morris-Gibson (“PMG”)**  
**Deposition Transcript Excerpts**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

PATRICIA MORRIS-GIBSON, an )  
individual, )  
Plaintiff, )  
-vs- ) Case No.  
THE INTERNATIONAL UNION, ) 2:20-cv-11346  
UNITED AUTOMOBILE, AEROSPACE )  
AND AGRICULTURAL IMPLEMENT )  
WORKERS OF AMERICA (UAW), )  
GERALD KAREEM, MIGUEL FOSTER, )  
and GEORGE HARDY, )  
Defendants. )

Videotaped Deposition of PATRICIA MORRIS-GIBSON

Wednesday, July 7, 2021 - 9:58 a.m. EST

Reported by:

SUSAN K. TODAY, CSR-IL, RPR

Job No.: Mo2722

1 A. No.

2 Q. You don't know?

3 A. No, I don't know.

4 Q. So you came on staff at the UAW in

5 November of 2018 -- I'm sorry -- 2008?

6 A. Yes.

7 Q. And what does an International rep in  
8 the TOP department service -- TOP do? Or at least  
9 what did they do at that time?

10 A. At that time I serviced BlueCross  
11 BlueShield. So I negotiated their contracts. I  
12 was a part of their arbitrations. I was a part of  
13 their grievance meetings, their presidents  
14 meetings. Any type of meeting that they would  
15 have, that the union leadership at BlueCross would  
16 have, I was a part of that.

17 Q. And at that point the TOP department was  
18 underneath Vice President Settles; is that right?

19 A. Yes.

20 Q. And who was your supervisor?

21 A. Dave Burtch.

22 Q. What position did Dave Burtch have, if  
23 you recall?

24 A. He was an AA. He was Jimmy's top AA.

1 Vice President Settles, or you had no opinion?

2 A. I was ecstatic that it was under the  
3 office of the president.

4 Q. Did you make a request at any point to  
5 work in the Ford department under the office of  
6 Vice President Settles?

7 A. In the Ford department?

8 Q. Yes.

9 A. I was already working up under Vice  
10 President Jimmy Settles.

11 Q. After 2014 when you were working with  
12 the office of the president, correct?

13 A. Correct.

14 Q. And at some point after you moved to --  
15 your report moved under the office of the  
16 president, did you make a request to go work for  
17 the Ford department?

18 A. No.

19 Q. Am I correct that the 2014 reassignment  
20 to TOP was sort of last -- sort of the most recent  
21 position reassignment that you had at UAW?

22 A. Are you asking when I -- I'm sorry. Can  
23 you just --

24 Q. Yeah. When you were reassigned sort of

1 to the TOP department in 2014 --

2 A. Okay.

3 Q. -- was that the last reassignment you  
4 had at UAW?

5 A. Yes.

6 Q. So I'm going to mark a couple of  
7 documents.

8 A. I'm sorry. Can I just go back to that  
9 question --

10 Q. Yes.

11 A. -- the last reassignment?

12 I was also assigned from IPS as well.

13 Q. That's fair. So in 2019 you -- your  
14 sort of duties were -- you were given duties in the  
15 IPS department rather than the TOP department?

16 A. No. Both.

17 Q. Both?

18 A. Yes.

19 Q. So at some point in 2019 your job duties  
20 included IPS work in addition to TOP work; is that  
21 fair?

22 A. Right. And some State of Michigan.

23 Q. Okay. So I'm going to mark some  
24 documents. So I will start by marking this as

1 my own calendar.

2 Q. So what calendar did you keep?

3 A. I usually keep one in my cell phone and  
4 also kept -- I'm old school -- also just had my  
5 little writings.

6 Q. And do you still have your calendar  
7 entries for 2018?

8 A. Probably not. I don't know. I can  
9 check. I still have a lot of stuff from 2018. And  
10 I might have it in my old phone.

11 But if I wasn't on vacation or medical  
12 and the presidents had a meeting, more than likely  
13 I was there.

14 Q. Okay. Am I correct that you went out on  
15 leave on October 3rd of 2018?

16 A. Yes, I believe so.

17 Q. How far in advance of your going out on  
18 leave on October 3rd did the kiss incident occur  
19 with Mr. Foster?

20 A. I'm not sure because I can't remember  
21 what date the kiss occurred.

22 Q. Okay. If there was a presidents meeting  
23 on the 26th of September, when would have been the  
24 previous presidents meeting?

1           A.       The president meetings -- they're  
2       biweekly meetings.  They're every two weeks.

3           Q.       Okay.  Can you flip back to Page 28 of  
4       this calendar?  It shows that there was a  
5       presidents meeting September 5th.  Do you see that?

6           A.       Uh-huh.

7           Q.       Do you have any reason to believe there  
8       wasn't a presidents meeting on September 5th?

9           A.       No.  I do know that there were also  
10       other meetings on that week.  My calendar was  
11       always full.  I never used this, never.

12               If someone sent me this meeting notice  
13       and it would pop up, every now and again I might  
14       respond and I would say I was going to attend.

15               But these should be filled.  That's why  
16       I know that is not accurate because my every day  
17       was filled just about with meetings.

18           Q.       I think I probably will have a  
19       conversation with your counsel about asking you to  
20       pull those calendars.  To the extent you have  
21       things that are responsive, I think they should be  
22       produced so that we can ask you questions about  
23       them and try to get some dates.

24           A.       That one I most definitely will pull up.

1           A.     George had IPS.  Mark Liburdi had TOP  
2     and George had IPS.  So when I say he had IPS, he  
3     was the AD over IPS and Mark Liburdi was the AD  
4     over TOP.  And then George became the AA when Ruben  
5     left.

6           Q.     Okay.  And then after Ruben left you had  
7     conversations with George Hardy about reassigning  
8     you; is that fair?

9           A.     Not reassigning me but about me learning  
10    another line of business.

11          Q.     Got it.  So what lines of business sort  
12    of were available within the department?

13          A.     Well, we had IPS, we had arbitration, we  
14    had aerospace, insurance, and state of Michigan.  
15    At that time we didn't have gaming.  Gaming came  
16    later.

17          Q.     In speaking to Mr. Hardy about your  
18    desire to learn or work in a different line of  
19    business, did you ever make a connection between  
20    your desire to do that and your desire not to work  
21    with Mr. Foster?

22          A.     No.  Did I ever tell George or relay  
23    that to George?

24          Q.     Yes.

1                   A.           No.

2                   Q.           Was it part of what was motivating you  
3                   though?

4                   A.           Once Miguel came to the department I had  
5                   that conversation, most definitely. And I would  
6                   have never told George why. I would have never got  
7                   myself in that type of trouble.

8                   Q.           What kind of trouble would it have been?

9                   A.           I wouldn't want to end up in a situation  
10                  where -- that I'm in now. I feel like I lost my  
11                  job because of all of this. That's why I keep  
12                  saying I just wanted to do my job.

13                  I never would have said anything about  
14                  sexual harassment to anyone because I just wanted  
15                  to do my job. And I say that because I didn't want  
16                  to end up like this. I didn't want to end  
17                  up -- I feel like retaliation.

18                  I just -- somehow I did not tell George  
19                  that I wanted to move, you know, because Miguel was  
20                  over TOP. But I did tell George and I kept going  
21                  back and I kept going back, you know, when is this  
22                  going to happen. George, you said you were going  
23                  to do this. George, when can I move, when can I  
24                  leave. I kept going back and having that

1 A. There were three assistant directors.

2 Miguel was one of them.

3 Q. And who were the other two?

4 A. Nadja was one. I'm trying to think.

5 Nadja was an AD. George was an AD for a minute and

6 then he became AA. Then there was Miguel, Mark

7 Liburdi. Okay.

8 They didn't replace George so we ended  
9 up with two in the end, which was Nadja and Miguel.

10 Q. Okay. So I guess one of my questions is  
11 when you spoke to George about wanting to go to  
12 work for a different area under his umbrella, did  
13 you only specify departments that Miguel was not  
14 involved with?

15 A. Yes. I actually also put that in  
16 writing. When Joe came, I put it in writing to  
17 Joe.

18 Q. Okay. And Joe came at some point in  
19 2019, is that correct, or after you came back from  
20 leave?

21 A. After I came back.

22 Q. All right. So you went out on a leave  
23 we previously established October 3rd, right?

24 A. Yes.

1 Q. And approximately do you recall when you  
2 came back to work at UAW?

3 A. March 11th.

4 Q. Of 2019?

5 A. Yes.

6 Q. And during this period when you were out  
7 on what I'll call like the first period of  
8 disability leave for our purposes, you were sent  
9 for an IME with Dr. Shiener; is that correct?

10 A. That is correct.

11 MS. CARTER: So let's mark a document.

12 (A document was marked Defendants'  
13 Deposition Exhibit No. 7.)

14 BY MS. CARTER:

15 Q. So I'm handing you a document that has  
16 been marked as Exhibit 7 with Bates numbers UAW 414  
17 to 423.

18 Do you recognize this document?

19 A. Yes.

20 Q. Is this the report that Dr. Shiener, the  
21 IME, prepared?

22 A. I believe so.

23 Q. And the first sentence of this says that  
24 he conducted an evaluation of you on February 28,

1 things that are in Dr. Shiener's report.

2 A. Okay.

3 Q. Is it correct that you told Dr. Shiener  
4 that you did see yourself returning to work at UAW?

5 A. That I didn't or I did?

6 Q. That you did.

7 A. Yes.

8 Q. And isn't it in fact true that you  
9 wanted to return to work at this point in time?

10 A. Yes. After I found out that George was  
11 demoted and we had a new AA, which was Joe Rioux, I  
12 thought it was because of what happened with me  
13 before I left, before I went on medical, so I  
14 thought it would be safe to go back and I was going  
15 to actually end up in another department.

16 Q. Okay. What was your basis for believing  
17 that George's demotion and the appointment of a new  
18 AA was related to you in any way?

19 A. Because George was liked by everyone.

20 He was doing a great job. I didn't -- my opinion,  
21 I didn't see any reason for him to be demoted  
22 outside of the way he handled my case. Or maybe  
23 that's what I wanted to believe. I don't know. But  
24 I was happy to know that there was going to be

1 someone new coming in to take over the department.

2 Q. And when you say the way he handled your  
3 case, are you referring to the report of the kiss  
4 by Mr. Foster?

5 A. The way he handled the whole ordeal with  
6 bringing me into Miguel's office. Just all of  
7 that.

8 And I thought because he didn't take it  
9 to human resources that that might have had  
10 something to do with it.

11 Q. What's your basis for believing he  
12 should have taken it to human resources?

13 A. After Nadja advised that that's where he  
14 should have taken it.

15 Q. Anything else?

16 A. Because there was a complaint. I mean,  
17 we don't have anything written, like any rule where  
18 there's a list of things that you should have taken  
19 and not take.

20 But because Nadja, who was another  
21 management person at that time, said she spoke with  
22 George and told George he should have taken it to  
23 human resources. At that point I believe he should  
24 have as well.

1 discussed your -- for which you prepared this  
2 document, Exhibit 8?

3 A. George and Miguel and Joe.

4 Q. Okay. And you identified that you would  
5 be interested in gaining aerospace and IPS; is that  
6 right?

7 A. Yes.

8 Q. And that you wanted to attend  
9 arbitrations?

10 A. Yes.

11 Q. Did you at any point tell Joe Rioux that  
12 you didn't want to be reassigned if it meant --  
13 reassigned to an area if it meant working with  
14 Mr. Foster?

15 A. I thought this did it.

16 Q. And why would this do it?

17 A. Because TOP is not on here and Miguel  
18 only had TOP.

19 Q. Okay. Did you ever specifically tell  
20 Joe that your issue with TOP was an issue with  
21 Miguel?

22 A. I never told anyone about my issue with  
23 Miguel as it relates to TOP because I -- I just  
24 wanted to come do my job. I did not want to have

1 any troubles. I didn't want to get fired, in  
2 organizing. I didn't want any problems. I just  
3 wanted to work. I felt like after all my years of  
4 just servicing that's what I should be able to do,  
5 just come to work and do my job.

6 So no, I did not tell Joe Rioux anything  
7 because Joe Rioux would have shared it with Miguel,  
8 George, Shrock, everyone. No, I didn't.

9 Q. Okay. And do you have any reason to  
10 know if Joe Rioux knew anything about the kiss that  
11 Hardy gave you or any of your other previous  
12 interactions with Hardy?

13 MR. EVELYN: Objection as to form.

14 Go ahead; answer.

15 BY THE WITNESS:

16 A. I didn't -- I thought he did up until my  
17 meeting with Shrock when Jeff Shrock advised me he  
18 didn't.

19 BY MS. CARTER:

20 Q. So why did you think he did?

21 A. Because they all in that -- I don't want  
22 to say clique, but a lot of management is just in a  
23 clique. I figure why wouldn't he know. It's  
24 something that just happened before he became the

1 on or about March 26th of 2019, does that sound  
2 right?

3 A. Sounds about right.

4 Q. What was your understanding of the  
5 purpose of that staff meeting?

6 A. That we were going to get our  
7 assignments.

8 Q. And who was present at that meeting?

9 A. I can just say who wasn't present  
10 because it was the entire staff with the exception  
11 of Sandra because I believe she was out on medical.  
12 And Nadja I don't believe was at that meeting. And  
13 I don't -- and Laura was no longer in our  
14 department. I think everyone else was there.

15 Q. So did he just sort of go around the  
16 room and give people assignments or how did it  
17 work?

18 A. It started with Joe saying that Miguel  
19 and George now have the new assignments and Miguel,  
20 I'm going to let you start. And Miguel had his  
21 documents and he handed one over to me, gave one  
22 over to Anthony and one over to Jorge.

23 Q. And what was on your document?

24 A. That I would be reporting to Miguel for

1 HAP, which is still insurance, and then I would  
2 also have some assignments with George, which is  
3 IPS.

4 And at that point I just screamed out  
5 why can't I get out of TOP. I was very emotional.  
6 And Joe Rioux' response was this is not the meeting  
7 for that; we can talk about that later. And after  
8 that I said absolutely nothing and the meeting just  
9 went on.

10 Later after the meeting was over I was  
11 upset. I was on my way home and George saw that I  
12 was upset. As I was walking down the hall he  
13 called me to his office. He's like, Patricia, he  
14 said, you just got to calm down. You know, you got  
15 Joe Rioux upset. He felt like you disrespect him  
16 in the meeting, you questioned his authority.

17 And I said I don't give a damn. I said,  
18 George, you're a part of everything that happened  
19 before. I have been gone four months. Four  
20 months. I said why don't anybody give a damn. Why  
21 don't anybody care? He's like Patricia, just calm  
22 down, I'll talk to Joe, I'll take care of it, I'll  
23 take care of it. I said I don't trust anyone and  
24 walked out.

1           Q.     So who, if anyone, did you talk to about  
2     getting an assignment where you would not be  
3     reporting to Miguel following that meeting?

4           A.     Following that meeting? There wasn't  
5     another meeting. After that I requested my IME and  
6     I requested -- after this happened I requested my  
7     IME report and I requested a copy of my personnel  
8     file because I'm like did the IME doctor not tell  
9     them what I just went through? It's like what's  
10    going on with these people. Why don't anybody  
11    care? I just felt like nobody cared.

12               And after that an investigation started,  
13    my second investigation.

14           Q.     You didn't expect Dr. Shiener's report  
15    to contain a narrative of everything you had told  
16    Dr. Shiener, right?

17           A.     I expected his report to pertain to  
18    things that happened with me regarding why I was  
19    out from UAW, sexual harassment, not my medical  
20    history, my past, my parents and all. I didn't  
21    expect any of that.

22           Q.     You expected Dr. Shiener's report to  
23    contain your allegations of harassment at UAW; is  
24    that right?

1 my old office because it was still my office. I  
2 was going to my office to get something out of the  
3 office and he was standing like right in front of  
4 Sandra Parker's office. And when I saw him, I just  
5 turned around and I went back the other way.

6 Q. Anything else in terms of instances of  
7 attempted intimidation?

8 A. Not that I can recall right now.

9 Q. All right. So did there come a time  
10 when you were interviewed by Jeff Shrock about your  
11 interactions with Miguel Foster?

12 A. The investigation?

13 Q. Yes.

14 A. Yes.

15 Q. And am I correct that your interview  
16 with Mr. Shrock occurred April 2nd of 2019?

17 A. Yes. Well, I met with Jeff four times.

18 Q. Okay.

19 A. The first time I met with Jeff I was  
20 with a committee person named Robert Evans because  
21 my committee person wasn't available. But -- okay.  
22 I called my president. I tried to reach him and I  
23 couldn't so I left him a message.

24 As we were on the way to Jeff Shrock's

1 office the president called and he said, no, you're  
2 not going to meet with Jeff Shrock and Robert  
3 Evans; I want to be in your meeting. So go ahead  
4 to the meeting and table the meeting and let Jeff  
5 Shrock know that you can't meet with him until I  
6 come in. So I did that. That was my first  
7 meeting.

8 Q. So to stop you there. That first  
9 meeting, there was no substantive discussion, like  
10 you met him as in "Hi, I'm Jeff"; "Hi, I'm  
11 Patricia," but there was no substantive discussion;  
12 is that fair?

13 A. He did say that he wanted to meet with  
14 me and my union representative to talk about the  
15 complaint that I had filed -- to talk about the IME  
16 report that was filed. And I said okay. And so  
17 that was the first. And so we left after that,  
18 Robert and I.

19 The second meeting was he just wanted to  
20 let me know there was going to be a thorough  
21 investigation. And at that meeting I asked if I  
22 could move my office. I told him because I was no  
23 longer feeling safe over on that side. And he told  
24 me it would be okay.

1                   And then the third meeting was the  
2 initial investigation meeting.

3                   Q.        And that's the April 2nd one?

4                   A.        No.      I'm sorry. Even in that second  
5 meeting, that's the one with Joe Rioux, and that's  
6 when he advised that I would be reporting to Joe  
7 Rioux and -- I would be reporting to Joe Rioux,  
8 that's what he said, while the investigation was  
9 going on.

10                  Q.        So am I correct that Jeff Shrock  
11 interviewed you about your allegations concerning  
12 Miguel Foster prior to the meeting with you and Joe  
13 Rioux about where your office was going to be?

14                  A.        No.      When you say prior, no. That was  
15 after my meeting with Joe Rioux that he did the  
16 investigation on me.

17                  Q.        So it's your testimony that the meeting  
18 about where to move your office occurred before the  
19 interview, the substantive interview?

20                  A.        Only because he had already told me that  
21 there was going to be an interview when I met with  
22 him and Robert. So one, that there was going to be  
23 interview once Scott Andrews was available. I  
24 tabled that one because Scott told me to.

1                   The second time that we met it was with  
2    Joe Rioux, Scott, me, and Jeff. And that was to  
3    tell me who I was going to be reporting to until --  
4    and I'm trying to think if Scott was even  
5    available. I know me, Joe Rioux, and Jeff was  
6    there, but that was just to let me know that my  
7    reporting structure has changed and that's because  
8    Scott wasn't there. So -- but he asked if he can  
9    meet with me, if it was okay if Scott wasn't there  
10   and I told him yes. And he said this meeting was  
11   just about the reporting structure.

12                   So the next meeting was the actual --  
13    Scott came to the meeting and we actually met.

14    Q.            So earlier this morning we looked at a  
15    document that was marked as Exhibit 3. These are I  
16    believe notes of Jeff Shrock's sort of interview  
17    with you; is that fair?

18    A.            Yes.

19    Q.            Okay. And this is dated April 2nd,  
20    2019. Does that sound about right?

21    A.            Yes.

22    Q.            So --

23    A.            He must have called me in on April 1st  
24    because I met with him prior to meeting with --

1 prior to our investigation. And he moved my  
2 desk -- he allowed me to move prior to the  
3 investigation.

4 Q. Okay. Did the meeting that you had  
5 where you discussed a revised reporting structure  
6 happen before or after April 2nd of 2019?

7 A. I don't know if it was -- it had to  
8 happen before because this is the investigation.

9 Q. Okay.

10 A. So he moved me prior to, or he allowed  
11 me to move prior to. He asked Joe if there were  
12 any other available offices.

13 Unless it happened on the same day at a  
14 different time. I'm not really sure of the date,  
15 but I do know he allowed me to move my desk.

16 Q. Okay. It's my understanding that after  
17 the investigational interview on April 2nd that  
18 there was a subsequent meeting with you and Shrock  
19 and Joe Rioux to discuss who you would report to in  
20 terms of work. Does that sound right?

21 A. I don't know. I'm not sure. I'm just  
22 not sure of the dates. But I do know that yes,  
23 there was a meeting for me to -- for them to report  
24 who I would be reporting to. I'm just not sure of

1 convention, where, you know, constitutional  
2 convention.

3 Q. A thousand-plus people; is that fair?

4 A. Maybe so.

5 And as far as who work on the floor,  
6 it's whoever they assign at the time. So different  
7 departments are assigned to work the floors.

8 Q. Approximately how many people work on  
9 that floor in Solidarity House?

10 A. How many people work the convention?

11 Q. No. I'm sorry. Work on -- what floor  
12 did you work on in Solidarity House?

13 A. Two. Second floor.

14 Q. How many people on the second floor  
15 roughly?

16 A. Maybe 20.

17 Q. How many people work in Solid House as a  
18 whole?

19 A. I'm not sure.

20 Q. How many floors are there?

21 A. Five, six. I don't know. Five I think.  
22 Well, if you count the basement because you do have  
23 people down there, I think it's six.

24 Q. At any point during the investigation

1 process in April of 2019 did you ask to move to a  
2 different department?

3 A. No, but I did ask why can't Miguel be  
4 moved to a different department. When he told me I  
5 could ask to move my office, I asked why couldn't  
6 he move his office. Why do I have to move my  
7 office. And my president asked that question as  
8 well.

9 Q. So the questions about Miguel moving  
10 offices, that was about the physical location of  
11 his office, right?

12 A. Yes. That was about me being three  
13 doors down from him.

14 Q. Okay. Did you ever ask if Miguel could  
15 move departments, not physical office but the  
16 department to which he was assigned?

17 A. When he asked -- when Joe Shrock asked  
18 me what did I want, I said not to have to see  
19 Miguel every day. I said not to have to work with  
20 Miguel.

21 So yes, I did tell him I don't want to  
22 see him, basically send him someplace else.

23 Q. Well, what you said was you didn't want  
24 to have to see Miguel every day, right?

1           A.     Which is impossible being on the second  
2     floor.  We share the same kitchen, we share the  
3     same copy room, we share the same secretaries.  
4     That's impossible.

5                   I saw Miguel when I was moved over to  
6     the other side just temporarily and I had to turn  
7     around.  But I was told I can come in early, I can  
8     leave late.  If I need copies, instead of me  
9     copying them, I can give them to the secretary and  
10    have her copy.  That would keep me from running  
11    into Miguel.

12           Q.     Did you ask to move to a different  
13    department within UAW altogether?

14           A.     No.  I didn't want to move to a  
15    different department.  I wanted to continue to work  
16    where I was working.

17           Q.     So following Jeff Shrock's investigation  
18    you were only going to be reporting to Joe Rioux;  
19    is that right?

20           A.     Yeah, but Joe advised me that I can also  
21    work with George.  Because they were assigning --  
22    they needed people to call around and find out if  
23    they was going to use (inaudible).  So in order for  
24    me to do that, I had to be assigned to George.

1 about the investigation. Does that sound right?

2 A. Yes.

3 Q. So between that point and when you went  
4 out on medical leave for the second major period  
5 did you have any interactions with Foster?

6 A. No. I saw Foster and that's when I said  
7 he was looking very angry.

8 Q. Okay. So there was the look. Any other  
9 interactions with Foster between those two times?

10 A. I didn't see him. No.

11 Q. Am I correct that you went out for this  
12 sort of second long period of disability on April  
13 25th, 2019?

14 A. Probably. I'm not sure of the dates. I  
15 think.

16 Q. But late April sounds right?

17 A. Yeah.

18 Q. You had been considering going back on a  
19 disability leave status prior to the April 17th  
20 meeting with Shrock and Naghmana, right?

21 MR. EVELYN: Objection as to form. Are you  
22 talking about a specific time frame?

23 BY MS. CARTER:

24 Q. Well, between when you returned -- when

1 talk about what it is that you're seeking in terms  
2 of damages in this lawsuit.

3 A. Okay.

4 MR. EVELYN: Yeah, go ahead.

5 BY MS. CARTER:

6 Q. That wasn't a question. It was more of  
7 a statement.

8 So as I understand it, you're seeking  
9 about \$2-1/2 million in lost wages. Does that  
10 sound about right?

11 A. I think that was the last thing that we  
12 got to.

13 Q. Okay. And is that a number that you  
14 calculated or that someone else calculated?

15 A. I actually calculated it more and I  
16 believe my attorneys did, too.

17 Q. Now I'm talking about lost wages, right,  
18 in terms of money that you would have made if  
19 you -- well, let me back up.

20 You're still employed by the UAW, right?

21 A. No.

22 Q. You are on leave from the UAW, correct?

23 A. As of June 30th my -- I received a  
24 letter that I was terminated.

1 Q. Okay.

2 THE VIDEOGRAPHER: Sorry to interrupt. Can  
3 you move the microphone a little be closer to the  
4 witness?

5 BY THE WITNESS:

6 A. As of June 30th I was terminated. I was  
7 actually initially terminated in April, but due to  
8 a mediation we had planned, I was advised that I  
9 would be -- if we didn't come up with a settlement  
10 at that point, the rest of my benefits and my -- I  
11 would be terminated as of June 30th.

12 BY MS. CARTER:

13 Q. And you understand that's because you've  
14 been on medical leave for over a year, correct?

15 A. Yes. I do understand that's their  
16 rationale.

17 Q. Okay. And that prior to the termination  
18 letter you could -- if you were released to return  
19 to work by your doctor you could have come back to  
20 work at the UAW, correct?

21 A. That is correct.

22 Q. Okay. In calculating your damages how  
23 long did you anticipate continuing to work at the  
24 UAW?

1           A.       I don't know. I could have worked as  
2 long as I wanted to.

3           Q.       How long did you -- but how long did  
4 you -- at what age did you anticipate retiring from  
5 the UAW?

6           A.       I didn't. It depends on when my  
7 finances was right.

8           Q.       Are you aware that under the current  
9 calculation you are assuming that you would have  
10 worked at the UAW until you were 77 or 78 years  
11 old?

12          A.       No.

13          Q.       Okay. Do you think you would have  
14 worked until you were 77 or 78 years old?

15          A.       I doubt it.

16          Q.       Okay. What's your best estimate as to  
17 when you would have retired from the UAW?

18          A.       I'm not sure. It depends on my health,  
19 my finances, if I'm still married. I don't know.

20          Q.       Have you ever contemplated working past,  
21 say, age 65?

22          A.       Yes.

23          Q.       How about past 70?

24          A.       Never gave it much thought.

1 C E R T I F I C A T I O N

2

3 I, SUSAN K. TODAY, a Shorthand Reporter  
4 and Notary Public within and for the State of  
5 Florida, do hereby certify:

6 That PATRICIA MORRIS-GIBSON the witness  
7 whose examination is hereinbefore set forth, was  
8 first duly sworn by me and that this transcript of  
9 said testimony is a true record of the testimony  
10 given by said witness.

11 I further certify that I am not related  
12 to any of the parties to this action by blood or  
13 marriage, and that I am in no way interested in the  
14 outcome of this matter.

15

16 IN WITNESS WHEREOF, I have hereunto set  
17 my hand this 14th day of July, 2021.

18

19

20 SUSAN K. Today, CSR-IL, RPR  
21 Notary Public, Orange County, Florida  
22 My Commission expires: 12-4-2023

23

24